

WAIKEM

Where you do the driving.

WAIKEM AUTO FAMILY

Shawn Raiter
Larson King, LLP
30 East Seventh Street, Suite 2800
St. Paul, Minnesota 55101
Via email sraiter@larsonking.com and regular U.S. Mail

Ford

Dear Mr. Raiter:

I am responding to Honda North America's Deputy General Counsel Lee M. Goldring's letter regarding Honda NA's intention to produce the following data that Waikem Honda has provided Honda NA related to vehicles Waikem Honda has sold:

Nissan

1. The type of vehicle at issue (e.g., year, make, model, door, trim, engine); and
2. The final purchase price of the vehicle, including any rebates from Honda on the vehicle and the gross and net profit to the dealer on the vehicle;

Mitsubishi

in response to a subpoena served in an unidentified federal class action lawsuit against unidentified major suppliers of auto parts and a judge's order (not provided) overruling Honda NA's objection to the subpoena.

Subaru

Waikem Honda objects to Honda NA's production of Waikem Honda's data listed in 1 and 2 above and in Mr. Goldring's letter. **Waikem Honda does NOT authorize any person or entity to permit its data to become a public record, and further requests the data be sealed via court order and that no other dealer nor consumer be given access; and that no information be given or produced in any other litigation/lawsuit or to any attorney not involved directly in the case.**

Hyundai

Sincerely,



David C. Waikem, Dealer Principal
Waikem Honda

Kia

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Vision/Mission Statement

"Each and every one of us commits to the excellence of our profession. We shall use the tools, the time, the training, the talent and the teamwork to become the benchmark of our peers. And let us all benefit from the results of our performance. Our customers, our community, our families and ourselves."